Qualitative Case Review Southwest Region

Fiscal Year 2006

Preliminary Results

Office of Services Review

February 2006

Executive Summary

- Southwest Region passed their QCR for the third consecutive year and demonstrated their ability to sustain excellent practice. They exceeded the exit requirements on overall Child Status, overall System Performance and all six core indicators.
- 24 cases were reviewed for the Southwest Region Qualitative Case Review conducted January30-February 3, 2006.
- The overall Child Status score was 96%, meaning only one case had unacceptable overall status. This far exceeds the exit requirement of 85%.
- Safety, Appropriateness of Placement, Health/Physical Well-being, Emotional/Behavioral Well-being, Learning Progress, Caregiver Functioning, and Satisfaction all scored above 85%.
- Family Resourcefulness had a surprising drop from 94% to 57%.
- The overall score for System Performance was 92%. This far exceeded the exit requirement of 85%.
- All six of the core indicators (Child and Family Team Coordination, Functional Assessment, Long-term View, Child and Family Planning Process, Plan Implementation, and Tracking and Adaptation) exceeded the 70% exit criteria, and five of the six achieved a score of 88% or better. Functional Assessment scored 71%.
- There were seven workers with a caseload of more than 16 cases. All seven of these workers had acceptable overall System Performance.
- There were only two workers with less than a year of work experience. Eighteen of the workers had four years or more of experience.

Methodology

The Qualitative Case Review was held the week of January 30-February 3, 2006. Twenty-four open DCFS cases in the Southwest Region were reviewed and scored. The cases were led by certified and/or mentor reviewers from the Office of Services Review (OSR), the Division of Child and Family Services (DCFS) or child welfare partner agencies. Nearly all of the shadow reviewers who participated for two days of the review represented child welfare partner agencies located within the region.

Because Southwest region has exited court oversight on the Qualitative Case Review, there were no reviewers participating from the Child Welfare Policy and Practice Group. For this same reason, cases were selected by OSR rather than CWPPG based on a sampling matrix assuring that a representative group of children was reviewed. The sample included children in out-of-home care and families receiving home-based services such as voluntary and protective supervision and intensive family preservation. Cases were selected to include offices throughout the region.

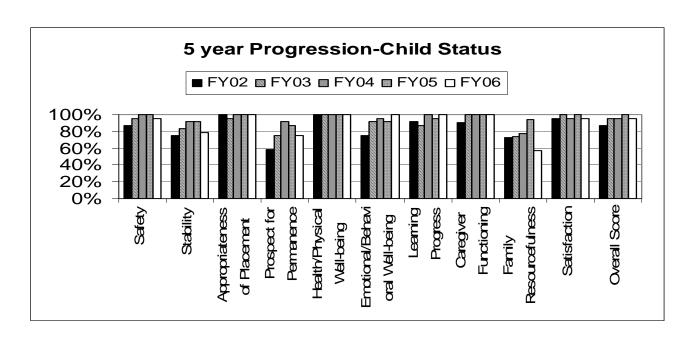
Information was obtained through in-depth interviews with the children (if old enough to participate), their parents or other guardians, foster parents (when placed in foster care), caseworkers, teachers, therapists, service providers and others having a significant role in the child's life. In addition the children's files, including prior CPS investigations and other available records, were reviewed.

The results in the following tables are based on the scores provided to OSR. They contain the scores of 24 cases. These results are preliminary only and are subject to change.

Southwest Child Status									
		# of cases			FY02	FY03	FY04	FY05	FY06
	# of cases	Needing							Current
	Acceptable	Improvement	Exit Criteria 85% on overall score						Scores
Safety	23	1	95.	8%	88%	96%	100%	100%	96%
Stability	19	5	79.2%		75%	83%	92%	92%	79%
Appropriateness of Placement	24	0	100.	.0%	100%	96%	100%	100%	100%
Prospect for Permanence	19	5	79.2%		58%	75%	92%	88%	79%
Health/Physical Well-being	23	1	9\$.	.8%	100%	100%	100%	100%	96%
Emotional/Behavioral Well-being	24	0	100.	0%	75%	92%	96%	92%	100%
Learning Progress	24	0	100.	.0%	92%	88%	100%	96%	100%
Caregiver Functioning	17	0	100.	.0%	91%	100%	100%	100%	100%
Family Resourcefulness	8	6	57.1%		72%	73%	78%	94%	57%
Satisfaction	23	1	9\$.	.8%	96%	100%	96%	100%	96%
Overall Score	23	1	9\$.	.8%	88%	96%	96%	100%	96%
			0% 20% 40% 60% 80% 10	00%					

1) This score reflects the percent of cases that had an overall acceptable Child Status score. It is not an average of FY06 current scores.

Note: These scores are preliminary and subject to change.



1)

Statistical Analysis of Child Status Results:

The overall Child Status score was 96%, which represents every case but one reaching an acceptable level. This far exceeds the exit requirement of 85%. The one case that was not acceptable received an unacceptable score on safety.

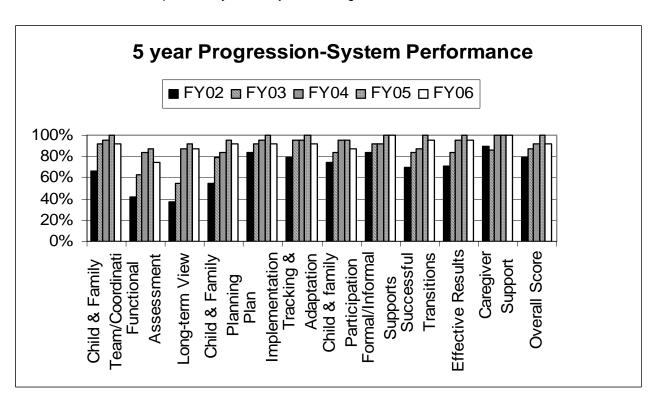
Seven of the ten indicators (Safety, Appropriateness of Placement, Health, Emotional/Behavioral Well-being, Learning Progress, Caregiver Functioning, and Satisfaction) scored either 96% or 100%. There was a modest decrease in Prospects for Permanence from 88% to 79% and a similar decrease in Stability from 92% to 79%. There was a significant drop in Family Functioning from 94% to 57%.

An analysis of the overall scores on the individual cases supports Southwest Region's remarkable performance. Nineteen of the twenty-four cases had an overall Child Status score of 5 or 6. This is very similar to the results for the prior two years. There were 22 cases last year that had an overall Child Status score of 5 or 6, and there were 20 such cases the year before last.

Southwest System Performance	•								
		# of cases			FY02	FY03	FY04	FY05	FY06
	# of cases	Needing	Exit C	Criteria 70% on Shaded indicators					Current
	Acceptable	Improvement	Exit C	Criteria 85% on overall score					Scores
Child & Family Team/Coordination	22	2	F	91.79	_% 67%	92%	96%	100%	92%
Functional Assessment	17	7		70.8%	42%	63%	83%	88%	71%
Long-term View	21	3		87.5	% 38%	54%	88%	92%	88%
Child & Family Planning Process	22	2		91.79	% 54%	79%	83%	96%	92%
Plan Implementation	21	3		87.59	% 83%	92%	96%	100%	88%
Tracking & Adaptation	22	2		91.79	% 79%	96%	96%	100%	92%
Child & family Participation	21	3		87,5	% 75%	83%	96%	96%	88%
Formal/Informal Supports	24	0		g/s	83%	92%	92%	100%	100%
Successful Transitions	22	1		95.179	1070	83%	88%	100%	96%
Effective Results	23	1		95.8° 100	% 71%	83%	96%	100%	96%
Caregiver Support	17	0		9	90%	86%	100%	100%	100%
Overall Score	22	2	-	91.9	[%] 79%	88%	92%	100%	92%
			0%	<u>6 20% 40% 60% 80% 100</u> 9	%				

1) This score reflects the percent of cases that had an overall acceptable System Performance score. It is not an average of FY06 current scores.

Note: these scores are preliminary and subject to change.



1)

Statistical Analysis of System Performance Results:

The overall score for System Performance was 92%; only two cases had unacceptable overall System Performance. This far exceeds the exit requirement of 85% set in the Milestone Plan.

Ten of the eleven System Performance indicators scored 88% or better. This was the third year in a row that Southwest region has achieved such remarkable System Performance scores. They clearly rose to the challenge of sustaining their practice after exiting court monitoring.

Every core indicator exceeded the exit criteria of 70%, and five of the six exceeded the criteria by a substantial margin. Only Functional Assessment remained near the exit criteria at 71%.

There was a little slippage in the overall System Performance scores, though the results were still remarkably high. Whereas last year 21 of the cases had an overall System Performance score of 5 or 6, this year there were 14 such cases. There were eight cases that had an overall System Performance score of 4, leaving just two cases that had an overall score of 3.

RESULTS BY CASE TYPE AND PERMANENCY GOALS

Of the 24 cases reviewed, 14 were foster care cases and 10 were in-home cases. There was a significant difference in the average scores of foster care and in-home cases the year before last (5.1 versus 4.6). There was a negligible difference last year (5.3 versus 5.2). The difference seen two years ago emerged again this year with foster care cases having an average score of 5.1 while in-home cases had an average of 4.5.

Only one case was a PSC case. It had an overall System Performance score of 5. Both of the cases that had unacceptable overall System Performance were PSS cases. They each had an overall score of 3.

Case Type	# in 2005 sample	# in 2006 sample	# Acceptable System Performance	% Acceptable System Performance	Average Overall System Perform. Score
Foster Care	11	14	14	100%	5.1
Home-based	13	10	8	80%	4.5

There were some interesting changes in the distribution of goals this year versus last year. This year there were twice as many children with Adoption or Guardianship goals (6 versus 3), three times as many children with Individualized Permanency Goals (6 versus 2) and only a third as many children with the goal of remaining home (5 versus 13).

Goal	# in 2005 sample	# in 2006 sample	# Acceptable System Performance	% Acceptable System Performance	Average Overall Sys Perform.
Adoption	2	4	3	75%	4.3
Guardianship (NR)	1	1	1	100%	6
Guardianship (R)	0	1	1	100%	5
Ind Permanency	2	6	6	100%	5.5
Remain Home	13	5	4	80%	4.8
Return Home	6	7	7	100%	4.6

RESULTS BY AGE OF TARGET CHILD

Only two cases had unacceptable overall System Performance. Both of these were cases of children age 5 or under.

System Performance				
Age of Child	# in sample	#Acceptable	% Acceptable	
0 to 5	8	6	75%	
6 to 12	4	4	100%	
13+	12	12	100%	
Total	24	22	92%	

RESULTS BY LENGTH OF EMPLOYMENT

Only two workers had less than a year of experience. Both of these workers had acceptable overall System Performance on their cases. The two cases with unacceptable overall System Performance each had approximately four years of experience. Lack of experience does not appear to be a factor in the results of this review.

System Performance					
Months Employed # in sample #Acceptable % Acceptable					
0-12 months	2	2	100%		
13+ months	22	20	91%		
Total	24	22	92%		

RESULTS BY CASELOAD

There were seven workers who had a large caseload (17 cases or more). Large caseloads didn't have an impact on the results as all seven of these workers had acceptable overall System Performance on their cases. These seven caseworkers had caseloads between 17 and 25 cases. Last year there were only six workers who had more than 16 cases and the year before that there were only four.

System Performance				
Caseload	# in sample	#Acceptable	% Acceptable	
16 or less	17	15	88%	
17 or more	7	7	100%	
Total	24	22	92%	

RESULTS BY OFFICES AND SUPERVISORS

The following tables display the overall case results by office and supervisor. Results were consistent across the region and between all supervisors. Only the F office had more than one case that did not have acceptable overall System Performance, but they also had several times the number of cases that other offices had. It is obvious that it was the united efforts of the entire region that led to the exceptional results seen again this year.

S YS TEM PERFORMANCE					
OFFICE	# Cases	# Acceptable	% Acceptable		
А	2	2	100%		
В	3	3	100%		
С	1	1	100%		
D	4	4	100%		
E	1	1	100%		
F	13	11	85%		
TOTAL	24	22	92%		

SYSTEM PERFORMANCE						
Lname	# Cases	# Acceptable	% Acceptable			
А	1	1	100%			
В	5	4	80%			
С	2	1	50%			
D	4	4	100%			
E	6	6	100%			
F	3	3	100%			
G	1	1	100%			
Н	2	2	100%			
TOTAL	24	22	92%			

CONCLUSION

Southwest Region again achieved excellent results on their QCR review. All but one case achieved acceptable scores on overall Child Status and all but two achieved acceptable overall System Performance. This success was seen across the region in every office and with every supervisor. Scores on individual indicators were very high. Southwest Region rose to the challenge and demonstrated that they can sustain excellent results without court oversight.

Content Analysis

Child and Family Assessment

OSR chose to do in depth content analysis on two indicators that declined from last year. These indicators are Child and

The following grid contains excerpts from all seven of the stories from the Southwest Review that had unacceptable scores on Child and Family Assessment. The case number, goal and reviewer comments explaining the reasons for scoring Child and Family Assessment as unacceptable appear in the table below.

Four of the seven cases had a goal of Reunification while a fifth had a goal of Remain Home. In every case, even the two cases which had goals of Individualized Permanency and Adoption, the lack of assessment was primarily around the parents, not the target child. Issues included such things as inadequately assessing safety risks in the home, insufficiently assessing parents' ability to care for the children, not identifying the underlying needs of the parents, lack of formal assessments on the parents, lack of information from extended family members, lack of assessment of parents' progress or lack of progress on service plan objectives, lack of assessment of parent/child relationships, and overlooking critical issues around the parents. Although there were also some pieces of assessment missing around the children on some cases, the explanations overwhelming refer to the parents as the parties for whom assessment is incomplete or inadequate.

In order to increase the percentage of cases with acceptable Functional Assessment, it appears the region would benefit from focusing workers' attention more on using the team to assess the strengths, needs, underlying needs, and progress of the parents.

Case #	Goal	Comments
#6	Reun	There was a potential safety concern identified in the case that was being addressed to a minimally adequate level, but it needs further attention. There have been concerns expressed about potential sexual reactivity between two of the children. It was not clear the therapist knew this needed to be addressed. Possible kinship placements need to be evaluated. The parents' ability to care for a disabled child and handle the accompanying financial and emotional stress needs to be assessed. It is unclear what the underlying needs of the parents are. How extensive are domestic violence and alcohol use in the family? There were still multiple assessments needed to determine what issues the parents are dealing with. The effect of cultural issues and lack of trust need to be assessed. Additional informal assessment information is needed from extended family members. It is unclear how long the father will be incarcerated, if and when he will reintegrate back into the family, and what his role in the family will be. Further

		assessment is needed of what will happen if the parents are not successful at reunification.
#10	Reun	The team doesn't seem to know what they need to know to move the case forward. They don't know which parent they should try to reunify the children with. Members of the extended family believe DCFS doesn't know what to do with the case. The litmus test for reunification appears to be housing yet the team is not clear on what barriers each parent faces in obtaining housing. Team members are on different pages. They are waiting for the judge to tell them what to do. There was lack of assessment of parents' underlying issues and progress or lack of progress on objectives. Target child is not allowed visits with Mother, yet team continues to push for reunification with her if she obtains housing. Assessment of their relationship is needed. Mother refuses to talk about her history with men, the suspected sexual abuse of the children, and the supported allegation that she failed to protect them. Parents' motivations around wanting the children are unclear and their future relationship is unclear as they say they are divorcing yet take no action toward that end.
#11	Reun	Some of the team members have a background with the family and have some informal knowledge of the family, but others members of the team do not. This history may be a reason why some of the team members are not as clear on why the family continues to struggle. About six weeks prior to the review there was a discussion that a parental fitness/mental health evaluation needed to be done on the mother to give more clarity and direction. This was scheduled for the week of the review but was postponed. The peer parent is not sure whether the mother is capable of parenting. The therapist hasn't met with her and doesn't know how capable she is of understanding the child's issues and doing what she needs to do if he is back in the home. Because the assessment on the mother has not been done and the family continues to struggle with the same issues that brought them into placement, the reviewers believe the team does not know enough to allow them to proceed with placing the child at home.
#14	Ind Perm	There were some critical pieces that were either known but overlooked or unknown to anyone but the parents. The epilepsy/seizure issue condition is widely unknown, even by the professional parent. The team was not aware that the child had Native American ancestry. The assessment document was not current and didn't accurately reflect the current status of the case.
#20	Reun	The assessment of the issues are limited to the objectives that mother is to accomplish, i.e. substance abuse, domestic violence and keeping the children safe. The formal evaluations included a psychological and substance abuse evaluation. The therapist has a different perspective than other team members regarding mother's needs. The children's needs do not seem to be factored into the process. Children don't

		,
		understand mother's drug use and what to expect during recovery. There are possible underlying issues that may come to the forefront in the future. A big picture of the psychological stressors facing all family members has not been fully developed. The team has information that could be used to develop a full assessment.
#22	Remain Home	In spite of two attempts (giving misleading information one time and not showing up the other time) Father has not completed his intake for a DV assessment. Due to some confusion he went to his primary care physician for a psychological which didn't meet the criteria for a psychological. Both parents have had mental health assessments. Father may be bipolar but this has not been confirmed because he hasn't completed a formal assessment. The extent of the domestic violence is unknown due to not completing assessments.
#23	Adoption	Although the biological parents underwent many drug and alcohol treatment programs, there were no drug and alcohol assessments or other mental health assessments about them or information about mental health issues of the mother. No other assessments on the child could be found in the case record. Assessment is now being completed upon recommendation of the regional subsidy committee. These assessments are still incomplete and were started the Saturday prior to the review. The assessment document is incomplete, includes too much unnecessary information, and was not based on any clinical evaluations. The document does not reflect the current issues or status of the case.

Family Functioning

Because there was a significant drop in the score on Family Functioning, OSR also looked at the six stories that had unacceptable scores on Family Functioning. Five of the six cases that had unacceptable scores on Family Functioning also had unacceptable scores on Child and Family Assessment. The case number, goal, and reviewers' explanations for the unacceptable scores on Family Functioning appear in the table below.

When reading the comments describing the families it quickly becomes apparent how challenging it is to assess their needs and engage them in interventions that would improve functioning. Most of the families have a long history of involvement with DCFS. Barriers such as incarceration, living out of the service area, limitations on the parents' functioning and capacities, isolation, minimization of issues and drug use all made assessment and intervention unusually difficult. Understanding the circumstances of these parents helps explain why it is so difficult to adequately assess the underlying needs of these families.

Case	Goal	Comments
#6	Reun	In the first four months there was little or no progress toward reunification due to the parents being jail or living away from where the service area. Mother was incarcerated until September 2005. Upon her release she moved to Kanab and requested her children be moved there. This didn't happen due to lack of services in Kanab for one of the children with special needs (cerebral palsy). Mother returned to the St. George area in December. The case was transferred to a new worker who worked hard at engaging mother. A Utah Family Conference was held in January, followed by a family team meeting. Father initially requested several visits but did not show up for them. Father moved to Arizona in September 2005. Father was arrested and incarcerated in December 2005 and remained incarcerated at the time of the review. Parents do not trust DCFS and have a long history of DCFS involvement. Mother is unemployed and has no housing. There is concern that parents may not be able to care for the special needs of their child long term.
#10	Reun	The family has a long history of involvement with DCFS. In the past three years allegations have been supported for DVRCA, neglect, non-supervision, sexual abuse, and failure to protect. Mother was incarcerated from May to Fall 2005. Mother was in a half way house until December 2005, then moved to the home of a relative living out of the area (Utah County). Father was incarcerated when children came in to care until released in June 2005. Father has a car and employment but has not completed parenting classes or anger management classes. He has missed opportunities to attend these classes. He does not have

		housing the door house sightle has attended these visits in the most
44.4	Davis	housing. He does have a job He has attended three visits in the past two months. Mother does not have housing. Both parents have been drug free for a couple of years. Mother has a job. Because she was just released from a halfway house she has just begun to have visits with the children. Mother refuses to discuss her history with men, the sex abuse of the children, and the allegation that she failed to protect them.
#11	Reun	Family has been involved with DCFS for over a decade mostly for non-supervision and neglect. The family's move from St. George to Enoch in the last six months has allowed DCFS to begin the process of reunification. Issues of non-supervision and neglect continue to plague the family. The family comes from a fundamentalist background and doesn't accept outside help readily, nor do they like people knowing about their family issues. It took several months for a peer parent to be accepted by the family. The family stressors include many small children in the home, a high child/caregiver ratio and social isolation. Team members indicate mother is struggling with the fact that people believe she can't parent and she can't see that there is a problem. They do have some support from their extended family.
#14	Ind Per	The family has an extensive history with DCFS. Children were removed due to physical, environmental and educational neglect. The family functions poorly due to the parents' developmental limitations. Both are low functioning. The child's disabilities are beyond the scope of the parents' abilities to provide adequate care. In addition to the unfit living conditions of the home, the parents demonstrated that they were unable to protect a child that was as vulnerable as this child is. Home doesn't provide privacy or safety and brother is a potential perpetrator. Parents have just begun to access counseling services.
#18	Reun	Mother has only been involved with DCFS since August 2004, but her family has had long term issues with DV and substance abuse. She has abused substances for the majority of her adult life but has consistently avoided consequences. The children came into care when mother was arrested on drug charges. Father had been incarcerated previously and remains incarcerated. Mother continues to struggle with employment, substance abuse, housing stability and inappropriate relationships. The team is moving toward terminating reunification. Child is frustrated with mother's lack of work to get them home. Mother has not engaged in treatment and courts and providers have not enforced compliance.
#22	Remain Home	Parents are young (20 and 21) and have only recently been involved with DCFS (for domestic violence), although each of their families have a history with DCFS. Services were offered but mother declined saying there was no need for them. She continues to deny the need for any help or services. The court ordered mental health assessments, DV assessments, parenting classes, anger management treatment, and a full psychological evaluation. Father does not read or understand well. Parents have minimally engaged in some services and been unwilling to engage in others.

Southwest Region Exit Conference February 3, 2006

Strengths

Long-term View

• Team members share the same big picture (13)* (20) (15) (4) (3) (5)

Teaming (4)

- Good coordination among professional team members (2) (19)
- Extraordinary commitment to child and Family (24)
- Good inclusion of all team members (teachers, neighbors, community partners, extended family, stepparent, coaches and neighbors) (12) (20) (21) (6) (11) (15) (5) (4) (17)
- Team worked well together with common goals and long term view (1) (5)
- Having an adoptive committee immediately involved helped permanency (1)
- Frequent meetings with team (19)
- Attention to the family needs in selecting location of team meetings (17) (5)

Caseworker Efforts

- Heroic efforts to get mother to comply with service plan (2) (17)
- Timely action for change (2)
- Genuine interest in child's success (12)
- Caseworker committed to family (21)
- Creative approach to achieving guardianship(3)
- Kept team informed and treated people with respect (11)
- Good transition between workers, worker staying involved (21) (19) (3)

Placement

- Good match of needs of child with family (13)
- Foster home willing to take five children and keep them together (10)
- Creativity in finding placements to keep siblings together (3) (6)
- Engagement
- Great engagement of family (14) (3) (6) (24) (17)
- Good engagement by worker with natural, foster and extended family (23)
- Family felt well respected and listened to by the team (19)
- Use of creative methods to include mother (4)

Formal and Informal Supports (5)

- Wide array of formal supports (even in rural areas) (14) (10)
- Therapist on case long term and committed to child (12)
- DCFS used family's informal supports to create safety and support reunification (19)
- Excellent peer parent (15)
- Timely use of informal supports (3)
- Formal supports transition into informal supports (11) (15) (4) (21)
- Kin placement
- Kin very committed to child (despite dealing with hostile birth parents) (24) (23)
- Diligent effort to find kin placements (24) (20)

Planning

- Good concurrent planning with foster adoption (1)
- Plan adjusted to meet needs of family (21) (4) (6) (3)

Supports for Workers

- Workers feel support from supervisors, administrators, support staff and professional partners (21) (6) (5) (4) (15) (12)
- Community partners have confidence in the workers and trust them (17) (6) (3) (21) (13) (1) (20) (24)

Practice Improvement Opportunities

Assessment

- Better assessment of parent's abilities and progress or lack of progress (10) (2)
 (11)
- Better assessment of underlying needs (20) (6)
- More focus in team meetings on assessments rather than just reporting activities (20)
- Mental health assessment needed for child who hears voices (19)
- Look at history of family and previous DCFS involvement (6)
- Child and Family Assessment was incomplete because they did not complete a psychological and other assessments (23) (6)
- Written document(s) didn't reflect the knowledge and assessment work of the team (20) (13)
- Professional assessments aren't adequate (20)
- Adapt substance abuse treatment to the client's need (level of intensity) and educate workers on how to do this (20)

Teaming

- Get foster parents more involved through better understanding of their needs (2)
- Better communication among team members (mental health and school, DWS, AG, DV, members not at the meeting) (13) (14) (24) (21) (19) (22)
- Short notice of team meetings prevents participation (13) (2) (10) (14) (21)
- Help family members understand child welfare system and processes (23)
- Father needs to be included (12)

<u>Transitions</u>

- More attention to transition issues (14) (23) (14)
- Increase specificity of transition planning (20)

Worker

- Understand the benefits of adoption over guardianship for young children (23)
- Worker needs to be proactive rather than taking a "wait and see" attitude (10) (23)

Tracking

Make adaptations when parents are not responding (10) (22) (17)

<u>Planning</u>

- Adapt plan and plan implementation when applicable (23) (22)
- Involve tribe more to understand what they expect of the family (6)
- Caseworker needs to ask ICWA questions. There needs to be more attention to identifying Native American children (12)

System Barriers

- Community partner perception that decisions are based on budget rather than clinical needs
- Can't get a specified relative grant for kinship placements and Medicaid for kin placements (24) (23)
- Caseloads too high (24)
- Proctor families not being able to go to guardianship (12)
- Judge orders generic activities that parents may not really need and worker is forced to provide services (20)
- Unable to utilize placements immediately due to licensing issues (21)
- AG and GAL caseloads are too high (03) (06) (all cases)
- Lack of dentists that will take Medicaid (11) (6) (all cases)
- More foster homes needed in rural areas (and everywhere) (11)

Region Recommendations

- Referral form that specifically asks for what needs to be assessed.
- Use a QA tool to randomly review cases and assess the case. Use it prior to closure as well.
- Train to the issues where there isn't enough familiarity or expertise.
- Process the assessments and write them up prior to the development of the plan. Put it on paper, not just in your head.
- Workload issues are limiting the amount of time available for the assessment process.
- Mentoring with those who have specialized training and expertise.
- Supervisor review the assessment before approving the plan.
- Utilizing informal resources to gather informal assessments.
- Explore how to handle confidentiality issues and access to the assessment document.

^{*} Numbers in parentheses represent numbers of the cases to which the comment pertains